

**APPENDIX A**


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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

**PLAINTIFF'S WITNESS LIST**

ALI BAHAR v. CITY OF CINCINNATI

Case No. C-1-01-798

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PRESIDING JUDGE  
MICHAEL WATSON

PLAINTIFF'S ATTORNEYS  
KELLY MULLOY MYERS  
RANDOLPH FREKING

DEFENDANT'S ATTORNEYS  
AUGUSTINE GIGLIO  
TERRY NESTOR

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TRIAL DATE(S)  
JANUARY 19, 2005

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	WITNESS NAME	DESCRIPTION OF EXPECTED TESTIMONY
	Tony Huang	Mr. Huang will testify to matters testified to during his deposition. Mr. Huang will testify as to Plaintiff's work performance and the policies and procedures of MSD. He will also testify as to the discriminatory practices within the MSD.
	Rao Donepudi	Mr. Donepudi will testify to matters testified to during his deposition. Mr. Donepudi will testify as to Plaintiff's character. He will also testify that Defendant wanted to terminate Plaintiff and the discriminatory practices within the MSD.
	Sam George	Mr. George will testify to matters testified to during his deposition. Mr. George will also testify as to Plaintiff's work performance and the policies and procedures within the MSD.
	Tom Quinn	Mr. Quinn will testify to matters testified to during his deposition. Mr. Quinn will testify as to Plaintiff's qualifications and work performance, and the policies and procedures within the MSD.

	WITNESS NAME	DESCRIPTION OF EXPECTED TESTIMONY
	Joe Niehaus	Mr. Niehaus will testify to matters testified to during his deposition. Mr. Niehaus will testify as to Plaintiff's work performance and character and the proper procedures for requesting and implementing change orders.
	Bob Campbell	Mr. Campbell will testify to matters testified to during his deposition. Mr. Campbell will testify as to Plaintiff's qualifications and work performance, the policies and procedures within the MSD and the engineer in training system. Mr. Campbell will also testify about the change order involving Plaintiff, his transfer to wastewater collection and his change in job status.
	Julia Johnson	Plaintiff anticipates that Ms. Johnson will testify to matters testified to during her deposition.
	Ali Bahar	Plaintiff has information concerning all matters at issue in this litigation.
	Laura Bahar	Mrs. Bahar, Plaintiff's wife, will testify regarding the damages and impact of the national origin harassment suffered by Plaintiff.